

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of

**INQUIRY REGARDING CARRIER
CURRENT SYSTEMS, INCLUDING
BROADBAND OVER POWER LINE
SYSTEMS**

ET Docket No. 03-104

To: The Commission

On this topic of Broadband over Power Line (BPL), I am entering my comment as an amateur radio operator (call sign AF8C). My opinions are backed up by five years of continuing first-hand experience in having telecommunications-induced radio frequency interference to amateur radio. I do not wish to experience further increases in levels of interference to my hobby. I am currently experiencing comb-like broadband noise every 60 kiloHertz on the shortwave band from approximately 5 MHz all the way up to approximately 30 MHz caused by something relative to the local telephone company. This interference has at times made communications on my amateur radio operations during live two-way contacts at my home virtually impossible. There is no way that I want to have interference levels raised further by BPL noise?

The Commission's Rules were written to protect my right to interference free reception of radio and television signals, and as an amateur radio operator, I also desire protection against interference on the amateur radio bands. My current amateur radio operations include all licensed modes on all bands from 1.8 MHz to 28-29 MHz. In addition, I operate packet radio on 144-147 MHz, but at least I do not seem to have interference on that VHF band. In addition, I have noticed no interference on the 70 cm amateur band.

Of course, as an amateur radio operator, I have already experienced problems with my signals interfering with Part 15 electronic devices on certain occasions, and I have taken steps to limit or cease my operations when necessary. But I cannot force the currently interfering telecommunications company (or companies) to cease operation in the reciprocal case, when they are bothering me. So I would naturally wonder why I would want to trust BPL carriers and operators not to further exacerbate my situation? Where is the test data that shows that BPL operation would not interfere with amateur radio operation, or for that matter, any other operation by licensed stations in the United States that depend on shortwave radio operation?

Before the Commission licenses or permits any BPL operations, the Commission should first require that the operators proposing to run BPL should build up a test situation in various community areas (in flat and mountainous terrain, for example) for short test periods (no more than 30 days). During those test periods anyone and everyone with an interference issue or concern be permitted to conduct interference sampling with any instrumentation they choose to bring on site. These test scenarios should then be repeated throughout the nation in order to develop reasonable sampling statistics. After that, then the Commission should publish the results of those tests in what would become "Part II" of these proceedings. Until all our concerns are backed up with real data, no rule-making should proceed.

Glenn Williams
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July 10, 2003 (late)